

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

BETTY ANNE WATERS, as)
 Administratrix of the Estate of)
 KENNETH WATERS,)
 Plaintiff,) Case No. 04 Civ. 10521 (GAO)
 v.)
)

TOWN OF AYER, NANCY TAYLOR-)
 HARRIS, in her individual capacity, ARTHUR)
 BOISSEAU, in his individual capacity,)
 BUDDY DECOT, in his individual capacity,)
 WILLIAM ADAMSON, in his individual)
 capacity, PHILIP L. CONNORS, in his)
 individual capacity, and JOHN DOE and JANE)
 DOES 1-16, in their individual capacities,)
 Defendants.)
)
)

PLAINTIFF'S SECOND
SUPPLEMENTAL RESPONSE TO
DEFENDANTS' FIRST REQUEST
FOR PRODUCTION OF DOCUMENTS

Comes Now Plaintiff and, pursuant to Fed. R. Civ. P. 26 and 34, offers a second set of supplemental responses to the following requests from Defendants' First Request for Production of Documents. By further responding to these requests for production, plaintiff does not waive any privileges or objections.

13. All records which evidence any alleged diminution of past and future earning capacity by the plaintiff's decedent as a result of the injuries described in the Complaint.

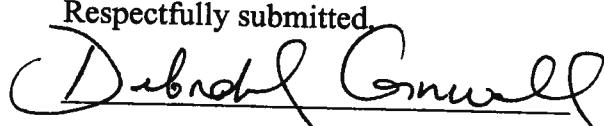
RESPONSE: See document attached. Other items responsive to this request have not yet been identified by plaintiff. As discovery is still ongoing, however, plaintiff reserves the right to supplement this response based upon information and items discovered during the pendency of this proceeding and up until the close of discovery.

14. Any and all exhibits which plaintiff intends to offer at trial.

RESPONSE: See document attached. Other items responsive to this request have not yet been identified by plaintiff. As discovery is still ongoing, however, plaintiff reserves the right to supplement this response based upon information and items discovered during the pendency of this proceeding and up until the close of discovery.

Respectfully submitted

Dated: August 19, 2005



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